

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
CHRISTOPHER P. FREY
3 Assistant Federal Public Defender
Nevada State Bar No. 10589
4 Chris_Frey@fd.org
KATE BERRY
5 Assistant Federal Public Defender
Nevada State Bar No. 14346
6 Kate_Berry@fd.org
200 S. Virginia Street, Ste. 340
7 Reno, Nevada 89501
(775) 321-8451/Phone
8
9 Attorneys for John Matthew Chapman

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA,
13
14 Plaintiff,
15 v.
16 JOHN MATTHEW CHAPMAN,
17 Defendant.

Case No. 2:20-cr-00091-JCM-DJA

**STIPULATION TO CONTINUE
OBJECTIONS TO REPORT AND
RECOMMENDATION
[ECF No. 168]
(First Request)**

18 IT IS HEREBY STIPULATED AND AGREED, by and between Federal Public
19 Defender Rene L. Valladares, and Assistant Federal Public Defenders Christopher P. Frey and
20 Kate Berry, counsel for JOHN MATTHEW CHAPMAN, United States Attorney Jason M.
21 Frierson, Assistant United States Attorneys Penelope Brady, Megan Rachow, and Steven Rose,
22 counsel for the United States of America, that the Objections to Report and Recommendation
23 (ECF 168) to Defendant's Motion to Suppress Statements (ECF No. 70) currently set for March
24 20, 2024, be continued to March 25, 2024.
25
26

The Stipulation to continue is entered into for the following reasons:

1. Defense counsel needs additional time to research and prepare the objections to the Report and Recommendation.

2. The defendant is currently detained and does not oppose the continuance.

3. The parties agree to the continuance.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for the defendant sufficient time to complete necessary research, prepare and submit appropriate pretrial motions.

5. The proposed date would allow counsel to represent other clients zealously and still allow for meaningful investigation and litigation of this case, including the filing of pretrial and trial motions.

6. Additionally, denial of this request for continuance could result in a miscarriage of justice. The additional time requested by this stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, § 3161(h)(7)(A), considering the factors under Title 18, United States Code §§ 3161(h)(7)(B)(i) and 3161(h)(B)(iv).

This is the first stipulation to continue filed herein.

DATED March 19, 2024.

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

By: /s/ Christopher P. Frey

By: /s/ Penelope Brady

CHRISTOPHER P. FREY
Assistant Federal Public Defender
Counsel for John Matthew Chapman

PENELOPE BRADY
Assistant United States Attorney
Counsel for United States

1 RENE L. VALLADARES
2 Federal Public Defender

JASON M. FRIERSON
United States Attorney

3 By: /s/ Kate Berry

By: /s/ Megan Rachow

4 KATE BERRY
5 Assistant Federal Public Defender
6 Attorney for John Matthew Chapman

MEGAN RACHOW
Assistant United States Attorney
Counsel for United States

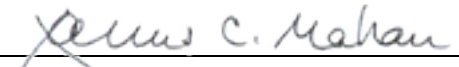
7 By: /s/ Steven Rose

8 STEVEN ROSE
9 Assistant United State Attorney
10 Counsel for United States
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

1 Based on the stipulation and good cause appearing,

2 IT IS THEREFORE ORDERED that the Objections to the Report and Recommendation
3 currently due on March 20, 2024; be filed and continued to March 25, 2024.

4
5 DATED March 20, 2024.

6
7 
8 UNITED STATES DISTRICT JUDGE